Mr. Don Wagoner Product Manager - Convoluted Flange NIBCO Inc. P. O. Box 1167 Elkhart, IN 46515

Dear Mr. Wagoner:

Thank you for your letter of May 31, 1979, and the results of the tests and stress analysis concerning the use of convoluted flanges for pipeline application.

Our letter of September 21, 1977, to Mr. Gunter Schlicht, Pipetech, Inc., (copy of which you enclosed) outlined what action we considered necessary to determine that the convoluted flange would: (1) provide an equivalent level of safety to that provided by flanges which meet the minimum requirements of the referenced specifications cited in Section 192.147 of Part 192, Code of Federal Regulations, and (2) be suitable for the service in which it is to be used under Section 195.126 of Part 195, Code of Federal Regulations, namely to develop a detailed design and stress analysis supported by a proof test under the provisions of UG-101 of the ASME Boiler and Pressure Vessel Code. You must assure yourself that the analysis and proof testing undertaken on your behalf support these conclusions before the convoluted flange can be used on pipelines subject to Parts 192 or 195.

We can neither endorse nor reject the convoluted flange as we do not approve proprietary products for use in pipelines.

Sincerely,

/signed/

Cesar DeLeon Associate Director for Pipeline Safety Regulation Materials Transportation Bureau Director

Office of Pipeline Safety Operations Dept. of Transportation Material Transportation Bureau Washington, D.C. 20590

May 31, 1979

Dear Sir:

I am enclosing a copy of correspondence concerning use of convoluted flanges for pipeline application. Also, I am enclosing a copy of the requested proof test and design and stress analysis. This will fulfill the requests made in the attached letter so I would like further correspondence on the acceptability of our convoluted flanges for pipelines application.

If I can be of further assistance to you in this regard, please feel free to contact me.

Sincerely,

Don Wagoner Product Manager - Convoluted Flange

Enclosure